

# **FACT SHEET**

**FOR THE DRAFT HAZARDOUS WASTE OPERATING PERMIT  
PREPARED FOR**

**HEXION SPECIALITY CHEMICALS, INC.**

EPA ID# LAD980622104

Agency Interest #87883

16122 River Road

Norco, LA 70079

St. Charles Parish

Permit Number LAD980622104-OP-RN-1

PER19960002

## **I. INTRODUCTION**

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste operating permit for Hexion Specialty Chemicals, Inc., EPA ID Number LAD980622104, Agency Interest Number 87883 for the Norco Facility located in Norco, St. Charles Parish, Louisiana.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste operating permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

Hexion Specialty Chemicals is seeking a hazardous waste permit governing the operating of Storage tanks T-C991, T-C992, T-C907, T-R913 and organic chloride incinerators NCIN-1 and NCIN-2.

### **A. THE PERMITTING PROCESS**

The purpose of this fact sheet is to initiate the permitting decision process. The Permittee's initial hazardous waste operating permit became effective on January 7, 1990. Hexion Specialty Chemicals (formerly Shell Oil Company) submitted an updated application on March 11, 2005.

The LDEQ's Waste Permits Division is required to prepare this draft hazardous waste operating permit. The draft hazardous waste operating permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. The permit includes those conditions necessary to achieve compliance

with Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., and all applicable regulations. The general and specific draft permit conditions are derived from appropriate chapters of LAC 33:V.Subpart 1.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1 and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft operating permit. The Administrative Authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the draft hazardous waste operating permit in accordance with LAC 33:V.705.

#### **B. DRAFT HAZARDOUS WASTE PERMIT**

The Waste Permits Division reviewed the Part B permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation, maintenance, and closure of the listed facilities.

This draft hazardous waste operating permit is a tentative determination and is not the final decision of the Administrative Authority.

#### **C. PUBLIC COMMENT PERIOD**

LAC 33:V.715 requires that the public be afforded the opportunity to comment on a draft permit decision prepared under the authority of the LDEQ. The time period of public comment shall be at least forty-five (45) days.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Hexion Specialty Chemicals Inc., Norco Facility must do so within the allotted forty-five (45) day comment period. Public notice of the proposed permitting action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

A public hearing for the draft permit will be held only if requested in writing. The date, location and time would be provided in a separate public notice. LDEQ will hold the hearing at least forty-five (45) days after the date on which the public notice is given.

#### **D. LOCATIONS OF AVAILABLE INFORMATION**

The administrative record, including all supporting documents is on file at the LDEQ Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft operating permit, fact sheet, and supporting documents are available for review at the St. Charles Parish Library Norco Branch, 197 Good Hope Street, Norco, Louisiana 70079.

#### **E. WRITTEN COMMENT SUBMISSION**

Interested persons may submit written comments on the draft hazardous waste operating permit to the Administrative Authority, at the address listed below, on or before the closing date of the comment period. All comments should include:

- (1) the name and address of the commenter,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts, upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Amy Exnicios  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Waste Permits Division  
P.O. Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-0968 or fax (225) 219-3158

## **II. DESCRIPTION OF OVERALL SITE**

Hexion Specialty Chemicals, Inc. (Hexion) is the owner and operator of the Norco Facility. Hexion is a Synthetic Chemical Manufacturing Industrial facility. Hexion manufactures organic chemical intermediates and products including operations of an allyl chloride/ crude epichlorohydrin process unit, high performance resins process unit, and a calcium chloride unit. The hazardous waste units include two (2) Organic Chloride Incinerators and four (4) Storage Tanks. All waste is stored and either treated on-site in the incinerators or is properly manifested and sent off-site for disposal.

## **III. HAZARDOUS WASTE FACILITIES**

The Norco Facility has three (3) permitted hazardous waste storage tanks one (1) hazardous waste storage tank that is currently used for less than ninety (90) day storage that Hexion wishes to permit and two (2) incinerators, which will operate in accordance with the conditions in the permit as specified by the regulatory requirements for the hazardous waste combustor (HWC) – Maximum Achievable Control Technology (MACT)/ 40 CFR 63, Subpart EEE.

## **IV. FINANCIAL AND LIABILITY REQUIREMENTS**

Hexion has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V. Chapter 37.

## **V. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED**

In accordance with the requirements set forth by the Louisiana Supreme Court in Save Ourselves v. Louisiana Environmental Control Commission 1152 (la. 1983), the LDEQ has considered the following factors in its draft decision on this renewal operating permit. This is a preliminary analysis based on information currently available to the LDEQ.

**A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**

Hexion submitted its renewal application for the Norco site, which includes four (4) tanks and two (2) incinerators.

All tanks are equipped with safety cutoffs, bypass systems, and pressure control systems to ensure that the tanks do not spill or overflow. Should a tank spill or overflow, all tank systems have secondary containment systems that will be able to keep hazardous waste from adversely affecting the environment. All ignitable wastes at Hexion are handled in order to help prevent ignition.

Hexion performed a Comprehensive Performance Test (CPT) for NCIN-1 and NCIN-2 on March 24, 2006, to demonstrate compliance with 40 CFR 63 Subpart EEE. LDEQ issued a Finding of Compliance (FOC) on July 14, 2006, and transferred the operating limits to their air permit to prevent dual permitting. A closure plan for the incinerators will be maintained in accordance with LAC 33:V.3121 and Chapter 35.

Potential releases are minimized due to the strict operating and design standards implemented by Hexion. These actions minimize potential and real adverse environmental effects to the maximum extent possible.

**B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

This is an existing facility submitting an application to renew its existing hazardous waste operating permit for of its onsite hazardous waste storage tanks and incinerators. The activities on site are conducted in ways that prevent adverse environmental impacts.

Renewal of the existing permit should not negatively effect the property values, the tax base, economic development, or public costs as they pertain to the economics of the local community. The renewal of Hexion's permit should not create a need for additional fire protection, police, medical facilities, or roads.

- C. **There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

1. ALTERNATIVE PROJECTS

This is the renewal of the existing permit for Hexion Specialty Chemicals, Inc.. There appears to be no known alternative project that would offer more protection to the environment than permitting the existing facilities without unduly curtailing non-environmental benefits. Relocating the four (4) hazardous waste tanks could create greater environmental impact when the transportation of hazardous waste is considered. Discontinuing use of the two (2) Organic Chloride Incinerators would cause an increase of off-site disposal of hazardous waste. The units have been permitted since 1990, and have proven to be reliable. No adverse impacts have been identified as a result of the operation of the facility.

2. ALTERNATIVE SITE

The existing facility currently provides treatment and storage operations for the existing production units. Relocating these units to different locations could cause greater environmental impact when transportation is considered, as well as the increase of hazardous waste production and transportation. When all factors are considered, no other site would offer more protection to the environment than the existing facility.

3. MITIGATING MEASURES

Hexion Specialty Chemicals, Inc. is an existing facility. It is renewing the existing permit that has been effective for ten years and will maintain current facility operations. No mitigating measures would offer more protection to the environment than repermitting the existing facilities without unduly curtailing non-environmental benefits.